

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

| | | |
|---------------------------|---|---------------------------|
| UNITED STATES OF AMERICA, |) | CASE NO. 1:21-CR-00491 |
| |) | |
| Plaintiff, |) | JUDGE J. PHILIP CALABRESE |
| |) | |
| v. |) | |
| |) | |
| PAUL SPIVAK, et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |
| |) | |
| |) | |

**DEFENDANTS PAUL SPIVAK AND OLGA SMIRNOVA’S NOTICE OF RECIPROCAL
DISCOVERY**

On July 12, 2024, Defendants Paul Spivak and Olga Smirnova, pursuant to Fed. R. Crim. P. 16(b) and in furtherance of their reciprocal discovery obligations, provided the United States of America with a production of materials bearing Bates stamps: SPIVAK_SMIRNOVA0000001-SPIVAK_SMIRNOVA0003682.

Defendants Spivak and Smirnova hereby notify the United States of America of their general intention to use all discoverable evidence pursuant to Fed. R. Crim. P. 16 in relation to this matter. Any further evidence to be used in Defendants Spivak and Smirnova’s case in chief will be disclosed, to the extent it has not already been produced by the government, pursuant to Fed. R. Crim. P. 16 and its provisions regarding the ongoing duty to disclose.

Dated: July 12, 2024

Respectfully submitted,

/s/ David L. Axelrod

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CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2024, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

/s/ David L. Axelrod

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